

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARIO EPELBAUM, on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

DYNAGAS LNG PARTNERS LP, DYNAGAS
GP, LLC, DYNAGAS HOLDING LTD., TONY
LAURITZEN, MICHAEL GREGOS and
GEORGE J. PROKOPIOU,

Defendants.

Civil Action No.: 1:19-cv-04512

Hon. Alison J. Nathan

**FIRST NEW YORK GROUP'S RESPONSE IN FURTHER SUPPORT OF ITS
UNOPPOSED MOTION FOR APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF SELECTION OF LEAD COUNSEL**

The First New York Group¹ respectfully submits this response in further support of its unopposed motion for appointment as Lead Plaintiff and approval of its selection of Lead Counsel. (ECF No. 27, the "Motion").

1. On July 16, 2019, the First New York Group filed its Motion, a proposed order, a memorandum of law and two supporting declarations. (ECF Nos. 27-31).

2. On the same day, two competing motions for appointment as Lead Plaintiff were filed. (ECF Nos. 24, 33).

3. On July 30, 2019, both competing movants withdrew their applications (ECF Nos. 36, 37), recognizing they did not have the largest financial interest in the relief sought by the Class.

4. Because the First New York Group is now the only applicant for appointment as Lead Plaintiff, and because its Motion is unopposed, and for the reasons stated in its opening

¹ The First New York Group is composed of Plaintiff Mario Epelbaum, FNY Partners Fund LP and Scott Dunlop. Capitalized terms herein not otherwise defined have the meanings assigned to them in the First New York Group's opening memorandum of law. (ECF No. 29).

memorandum (ECF No. 29), the First New York Group respectfully submits that the Court should: (i) appoint the First New York Group as Lead Plaintiff; (ii) approve its selection of Entwistle & Cappucci LLP as Lead Counsel; (iii) consolidate all subsequently filed, transferred or removed actions that are related to the claims asserted in this Action; and (iv) direct that all future pleadings and papers filed in the Action bear the caption: “*In re Dynagas LNG Partners LP Securities Litigation.*”

5. For the Court’s convenience, a copy of the First New York Group’s proposed order (ECF No. 28) is attached hereto as Exhibit 1.

DATED: July 30, 2019

Respectfully submitted,

/s/ Andrew J. Entwistle

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Counsel for the Class*